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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GABRIELA BERDUZCO,

Case No. 2:20-CV-01976-MCE-AC

Plaintiff,

vs.

**SECOND REQUEST AND STIPLUTION
TO EXTEND THE DISCOVERY
DEADLINE AND ORDER**

C & C NORTH AMERICA, INC. WHICH
WILL DO BUSINESS IN CALIFORNIA AS
SMDS WEST COAST, (aka COSENTINO, aka,
COSENTINO NORTH AMERICA); JEFF
PRATT; EMITT ISAACKS and DOES 1-50,

**FRCP 16(b)(4)
Local Rule 143, 144**

Defendants.

STIPULATION

WHEREAS On October 2, 2020, this Court issued an Order stated that all discovery, with the exception of expert discovery, shall be completed no later than three hundred and sixty-five (365) days from the date of the last answer filed. (DOC 4).

WHEREAS the last answer was filed on May 18, 2021, by Defendant Jeff Pratt. (DOC 10).

WHEREAS on June 30, 2019, Plaintiff served over a hundred Request for Production of Documents on each of the defendants in this matter.

1 WHEREAS on May 2, 2022, the Court granted the party's request to extend the deadline for
2 discovery 60 days from May 17, 2022 to July 17, 2022. (DOC 12).

3 WHEREAS the subsequent deposition of Defendants' has raised additional discovery issues
4 around the completeness of Defendants' document production to date;

5 WHEREAS the parties have continued to engage in extensive and productive meeting and
6 conferring regarding the production documents;

7 WHEREAS the production of the additional documentation may necessitate subsequent
8 deposition of the defendants.

9 WHEREAS the additional discovery is necessary to increase the potential for settlement
10 without the necessity of trial;

11 WHEREAS one request for extending the time for discovery for sixty (60) days has been
12 given in this matter;

13 THEREFORE, the parties request an additional sixty (60) days to complete the discovery in
14 this matter.

15 Plaintiff Gabriela Berduzco and Defendants C&C North America, Inc., Jeff Pratt, and Emmitt
16 Isaacks, through their undersigned counsel, hereby stipulate to the extension of discovery sixty (60)
17 days, from July 17, 2022 until September 15, 2022.

18
19 IT IS SO STIPULATED.
20

21 Dated: 7/13/2022

/s/ Paul Alaga

Paul L. Alaga,
Attorney for Plaintiff

22
23
24 Dated: 7/13/2022

/s/ Tim Watson

Tim Watson
Attorney for Defendants

ORDER

The Court GRANTS the foregoing stipulation and hereby orders that the deadline for discovery be extended sixty (60) days from July 17, 2022, until September 15, 2022. All other deadlines shall be extended accordingly.

IT IS SO ORDERED.

Dated: July 15, 2022



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE